

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

THE NATIONAL ASSOCIATION FOR
THE ADVANCEMENT OF COLORED
PEOPLE SPRING VALLEY BRANCH;
JULIO CLERVEAUX; CHEVON DOS
REIS; ERIC GOODWIN; JOSE VITELIO
GREGORIO; DOROTHY MILLER;
HILLARY MOREAU; and WASHINGTON
SANCHEZ,

Plaintiffs,

v.

EAST RAMAPO CENTRAL SCHOOL
DISTRICT,

Defendants.

Case No: 7:17 Civ 08943(CS)(JCM)

**PLAINTIFFS' MOTION TO SEAL MEMORANDUM OF LAW IN SUPPORT OF
RULE 72(a) OBJECTION TO, AND MOTION TO RECONSIDER, MAGISTRATE
JUDGE'S DECEMBER 3, 2018 ORDER GRANTING DEFENDANT'S MOTION TO
QUASH SUBPOENAS DIRECTED TO DAVID BUTLER**

Plaintiffs National Association for the Advancement of Colored People, Spring Valley Branch; Julio Clerveaux; Chevon Dos Reis; Eric Goodwin; Jose Vitelio Gregorio; Dorothy Miller; Hillary Moreau; and Washington Sanchez ("Plaintiffs") respectfully request the Court's authorization to file documents under seal in connection with Plaintiffs' memorandum of law in support of their objection to, and motion to reconsider, Magistrate Judge McCarthy's December 3, 2018 order granting Defendant East Ramapo Central School District's ("Defendant") motion to quash subpoenas directed to David J. Butler.

Plaintiffs request that Exhibits 1, 4, and 5 to the memorandum of law be filed under seal.

The documents, which consist of two WhatsApp chats and one text message exchange, were produced and designated as “confidential” by the Defendant pursuant to the parties’ Stipulated Protective Order, dated February 6, 2018 (Dkt. No. 64)(the “Protective Order”).

Plaintiffs do not believe these documents contain information that “adversely affect[s] the [Defendant’s] privacy obligation or personal interests” (Protective Order, Definitions) but respectfully request that they be filed under seal because of the Defendant’s confidentiality designations. Plaintiffs reserve all rights to challenge these designations of confidentiality at a later time. Plaintiffs appreciate the Court’s consideration in this matter.

* * *

LATHAM & WATKINS, LLP

Dated: December 17, 2018

/s/ Claudia Salomon

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and Washington Sanchez

CERTIFICATE OF SERVICE

I hereby certify that on, December 17, 2018, a true and correct copy of the foregoing was served by CM/ECF on all counsel of record, including the following:

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s/ Claudia Salomon

Claudia Salomon